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7                   UNITED STATES DISTRICT COURT  
8                   WESTERN DISTRICT OF WASHINGTON  
9                   AT TACOMA

10                   **CANTON PORT SERVICES, LLC**

11                   Plaintiff,

12                   v.

13                   **M/V INDIGO SPICA  
(IMO No. 9708758),**

14                   her engines, boilers, apparel, tackle, boats,  
15                   appurtenances, etc., *in rem*,

16                   Defendant.

17                   **IN ADMRALTY**

18                   Case No.

19                   **VERIFIED COMPLAINT TO ARREST  
20                   VESSEL TO FORECLOSE A  
21                   MARITIME LIEN**

22                   Plaintiff, Canton Port Services, LLC (“Canton” or “Plaintiff”) by its undersigned attorneys, files this Verified Complaint against the M/V INDIGO SPICA (IMO No. 9708758), her engines, boilers, apparel, tackle, boats, appurtenances, etc., *in rem* (the “Vessel”), pursuant to Fed. R. Civ. P. *Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions* (SAR) Rule C, seeking to foreclose a maritime lien for necessaries and the issuance of a warrant of arrest for the Vessel, and alleges upon information and belief as follows:

23                   **I.           JURISDICTION AND VENUE**

24                   1.         This is a case of admiralty and maritime jurisdiction within the meaning of Fed. R. Civ. P. 9(h) and Title 28 U.S.C. §1333. Original and exclusive jurisdiction of all such suits is vested in the district courts of the United States.

25                   2.         This Verified Complaint is *in rem* against the Vessel with a prayer for the issuance of a warrant of arrest pursuant to SAR Rule C of the Federal Rules of Civil Procedure.

26                   **VERIFIED COMPLAINT TO ARREST VESSEL  
27                   TO FORECLOSE A MARITIME LIEN - 1**

44444.1709/9569726.1

LANE POWELL PC  
1420 FIFTH AVENUE, SUITE 4200  
P.O. BOX 91302  
SEATTLE, WASHINGTON 98111-9402  
206.223.7000 FAX: 206.223.7107

1       3.     Venue is proper in this District because the Vessel is an ocean-going vessel that is  
2 now or soon to be within this District at the Kalama Export Berth for loading grain, Port of  
3 Kalama, 110 W. Marine Drive, Kalama, WA 98625, within the jurisdiction of the Western District  
4 of Washington.

5                                  II.     THE PARTIES

6       4.     Canton is a limited liability company formed under the laws of the state of  
7 Maryland with its principal place of business in Baltimore, Maryland. Canton is in the business  
8 of stevedoring and warehousing cargo.

9       5.     Canton is the lessee and operator of the Pier # 11 Canton Marine Terminal (the  
10 “Canton Pier”). The Canton Pier is located in Baltimore, Maryland with a street address of 3800  
11 Newgate Avenue, Baltimore, Maryland 21224. The Canton Pier is utilized by Canton to offload  
12 cargo from vessels.

13      6.     Upon information and belief, the Vessel was and still is a Panamanian-flagged  
14 bulker.

15      7.     Upon information and belief, at all relevant times hereto, the Vessel was owned by  
16 IMS Maritime SA (“IMS”), with a principal place of business located in care of IMECS Co Ltd  
17 (“IMECS”), 18<sup>th</sup> Floor, Itochu Building, 5-1, Kita-Aoyama 2-chome, Minato-ku, Tokyo, 10-0061,  
18 Japan, and managed by IMECS, with a principal place of business located at the same address as  
19 IMS. Upon information and belief, IMS and/or IMECS is in the business of owning ships.

20      8.     Upon information and belief, Hanwin Shipping Limited (“Hanwin”) is a company  
21 located in China that carries ocean cargo and charters vessels. Upon information and belief,  
22 Hanwin’s principal place of business is located at Room 802, Magnolia Plaza, No. 777 Hongqiao  
23 Road, Shanghai, China Shanghai, and which is incorporated in England and Wales with a  
24 registered address located at Dept. 906, 196 High Road, Wood Green, London, United Kingdom  
25 N22 8HH.

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VERIFIED COMPLAINT TO ARREST VESSEL  
TO FORECLOSE A MARITIME LIEN - 2

44444.1709/9569726.1

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### **III. STATEMENT OF FACTS**

9. Upon information and belief, at all relevant times hereto, Hanwin chartered the Vessel. The Vessel was primarily carrying plywood which, upon the Vessel's arrival at the Canton Pier in Baltimore in July 2022, was confirmed to be damaged and distressed.

10. At the direction and with the approval of the Master of the Vessel, the Vessel arrived at the Canton Pier on or about July 19, 2022, for the unloading of distressed cargo from the Vessel.

11. Subject to the direction and with the approval of the Master of the Vessel, Canton provided stevedoring services to the Vessel and unloaded the Vessel from July 19, 2022, to July 25, 2022 (the “First Call”).

12. The Master of the Vessel, an authorized agent for the owner of the Vessel, authorized and approved the stevedoring services provided by Canton by, *inter alia*, signing/stamping daily Canton Stevedoring Team Activity Reports, which describe the services provided by Canton to the Vessel each day during the First Call. See **Exhibit 1**, Canton Stevedoring Team Activity Reports for 07/19/2022 – 07/25/2022.

13. Canton issued two invoices – Invoice Nos. 132468 and 132454 (the “First Call Invoices”) – for the services Canton rendered to the Vessel during the First Call. *See Exhibit 2*, Invoice Nos. 132468 and 132454.

14. Both of the First Call Invoices were paid for in full, and Plaintiff has no maritime lien claim arising out of the First Call Invoices.

15. Due to the cargo's distressed condition, the offloading of the Vessel could not be completed during the First Call. Thus, the Vessel had to be brought back to the Canton Pier a few days after completion of the First Call to complete the offloading of the remainder of the cargo.

16. At the direction and with the approval of the Vessel's Master, the Vessel returned to the Canton Pier on August 6, 2022, for the offloading of the remaining cargo.

17. Subject to the direction and with the approval of the Vessel’s Master, Canton provided stevedoring services to the Vessel and unloaded the Vessel from August 6, 2022, to August 12, 2022 (the “Second Call”).

18. Once again, the Master of the Vessel, an authorized agent for the owner of the Vessel, authorized and approved the stevedoring services provided by Canton by, *inter alia*, signing/stamping daily Canton Stevedoring Team Activity Reports, which describe the services provided by Canton to the Vessel each day during the Second Call. See **Exhibit 3**, Canton Stevedoring Team Activity Reports 08/06/2022 – 08/12/2022.

19. On August 16, 2022, Canton issued Invoice No. 132524 (the “Second Call Invoice”) in the amount of \$233,006.00 for the stevedoring services Canton rendered to the Vessel during the Second Call. See **Exhibit 4**, Second Call Invoice - Invoice No. 132524. All charges in the Second Call Invoice are related to the discharging of distressed cargo from the Vessel by Canton.

20. To date, Canton has not received any payment for the Second Call Invoice. The entire Second Call Invoice in the amount of \$233,006.00 remains unpaid.

21. In accordance with customary maritime practice and the federal general maritime law, Canton provided a necessary – stevedoring of cargo to be offloaded – to the Vessel. The stevedoring services constitute a maritime lien for necessities to the Vessel consistent with the *Commercial Instruments and Maritime Liens Act*, 46 U.S.C. § 31342 (CIMLA).

22. Canton has a maritime lien against the Vessel in the amount of \$233,006.00 for the value of the stevedoring services Canton rendered to the Vessel during the Second Call.

23. Canton is entitled to a judgment against said Vessel, *in rem*, in the amount of \$233,006.00 together with interest, fees, costs, including but not limited to expenses *in custodia legis*.

**Count I – Prayer for the Arrest of the Vessel  
Pursuant to Supplemental Rule C**

24. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1-  
23 above.

**VERIFIED COMPLAINT TO ARREST VESSEL  
TO FORECLOSE A MARITIME LIEN - 4**

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P.O. BOX 91302  
SEATTLE, WASHINGTON 98111-9402  
206.223.7000 FAX: 206.223.7107

1       25. Canton provided stevedoring services to the Vessel on the order of the owner of the  
2 Vessel and/or a person authorized by the owner of the Vessel.

3       26. The Master of the Vessel acknowledged, approved, and signed off on the  
4 stevedoring services provided by Canton during the duration of the Second Call. *See Exhibit 3.*

5       27. To date, Canton has not been paid for the stevedoring services it provided to the  
6 Vessel.

7       28. Thus, Canton holds a maritime lien against the Vessel for the stevedoring services  
8 it provided to the Vessel in the amount of \$233,006.00.

9       29. Rule C of the *Federal Supplemental Rules for Admiralty or Maritime Claims and*  
10 *Asset Forfeiture Actions* (SAR) authorizes Canton to assert and foreclose its maritime lien against  
11 the Vessel *in rem*.

12       30. Accordingly, pursuant to SAR Rule C, Canton is entitled to foreclose its maritime  
13 lien for necessities against the Vessel and requests that this Honorable Court issue an order and  
14 warrant for arrest of the Vessel and enter judgment against the Vessel.

15           WHEREFORE, Plaintiff, Canton Port Services, LLC, prays that:

16       A. This Honorable Court issue an Order directing the clerk to issue a warrant for the  
17 arrest of the Vessel, *in rem*, pursuant to SAR Rule C;

18       B. That any security thereafter fixed by this Honorable Court be conditioned for the  
19 maximum amount permitted by SAR Rule E(5), which permits up to twice the amount of  
20 Plaintiff's claim;

21       C. The claim of Plaintiff be adjudged to be a maritime lien on the Vessel and that a  
22 judgment be entered in favor of Plaintiff against the Vessel in the amount of \$233,006.00, plus  
23 interest, costs, and attorney's fees, and that the Vessel be condemned and sold to pay the same;  
24 and

25       D. This Honorable Court grant such other and further relief as it deems just and proper.

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VERIFIED COMPLAINT TO ARREST VESSEL  
TO FORECLOSE A MARITIME LIEN - 5

44444.1709/9569726.1

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1  
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3 DATED: November 15, 2023  
4

5 LANE POWELL PC  
6

7 By: s/Katie Smith Matison  
Katie Smith Matison, WSBA No. 20737  
8 s/Daniel Miller  
Daniel Miller, WSBA No. 56810

9 1420 Fifth Avenue, Suite 4200  
P.O. Box 91302  
10 Seattle, Washington 98111-9402  
Telephone: 206.223.7000  
11 [matisonk@lanepowell.com](mailto:matisonk@lanepowell.com)  
[dmiller@lanepowell.com](mailto:dmiller@lanepowell.com)  
12 *Attorneys for Canton Port Services, LLC*

13 *Pro Hac Vice Admission to Be Filed*

14 GORMAN & WILLIAMS  
15 Ashley L. Ensor  
David McI. Williams  
16 36 South Charles Street, Suite 900  
Baltimore, MD 21201  
17 Tel: 410-528-0600  
Fax: 410-528-0602  
18 [aensor@gw-law.com](mailto:aensor@gw-law.com)  
[dmwilliams@gw-law.com](mailto:dmwilliams@gw-law.com)

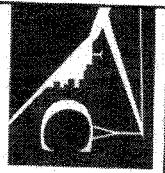
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VERIFIED COMPLAINT TO ARREST VESSEL  
TO FORECLOSE A MARITIME LIEN - 6

44444.1709/9569726.1

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# EXHIBIT 1



# ANTON STEVEDORING

Team Activity Report

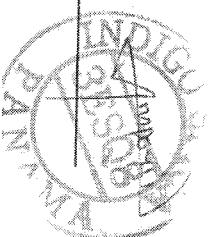
Phone: 410-633-1601

A N T O N S T E V E D O R I N G							
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hold	MV Indigo Spica		Michalos / Remery	Canton - Pier 11	Ships Gear	
					Bastien / Rodgers / Gallardo	PH	XL
						SB	Remarks
7/19/2022	Tuesday	MV Indigo Spica		Michalos / Remery	Canton - Pier 11	Ships Gear	
Team Hours	Hold	Activity & Cargo		Bastien / Rodgers / Gallardo	PH	XL	SB
<b>GANG 1</b>							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
1300-1400		Lunch Break					
1400-1700	2	Discharging Plywood		2		X	Shifted stow, broken bands/straps.
<b>GANG 2</b>							
0700-0715		Safety Meeting					
0715-1300	5	Discharging Plywood		4			1700 - Gang knocked off due to lack of trucks.
1300-1400		Lunch Break					
1400-1700	5	Discharging Plywood		4			1700 - Gang knocked off due to lack of trucks.
<b>GANG 3</b>							
1700-1900		Loading Trucks/Warehouse					1700-1900 Continue loading trucks and transferring plywood to warehouse.
							Daily Total: 1002 x total plywood bundles discharged * 128 x plywood bundles transferred to warehouse * 16 x bundles will require recouping
							No Stevedore Damage to Vessel

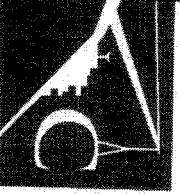
Stevedore Superintendent

*[Signature]*

Captain/ChiefMate



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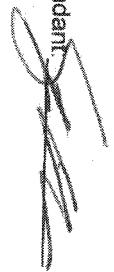
# ANTON STEVEDORING

## Team Activity Report

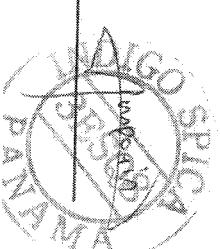
Phone: 410-633-1601  
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment		
7/20/2022	Wednesday	Indigo Spica		Michalos/ Remer	Rodgers/ Gallaraga	PH	XL	SB	Ships Gear
Team Hours		Activity & Cargo							Remarks
Gang 1									
0700-0715		Safety Meeting							
0715-1300	2	Discharging Plywood	2			X			Shifted stow, broken bands/straps
1300-1400		Lunch							
1400-1900	2	Discharging Plywood	2			X			Shifted stow, broken bands/straps
Gang 2									
0700-0715		Safety Meeting							
0715-1300	5	Discharging Plywood	4		X	Brick Stowage			
1300-1400		Lunch							
1400-1900	5	Discharging Plywood	4		X	Brick Stowage			
		No Stevedore Damage to Vessel							

Stevedore Superintendent:



Captain/ChiefMate:



SuperCargo/Port Captain:



**ANTON**  
STEVEDORING

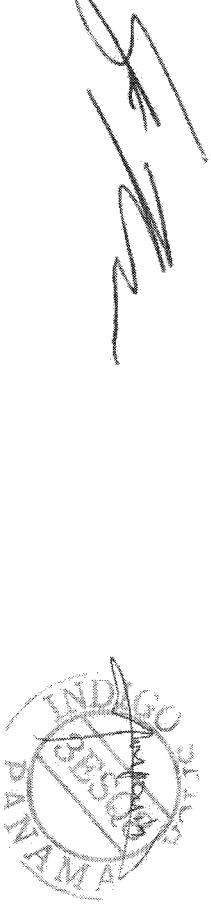
### Team Activity Report

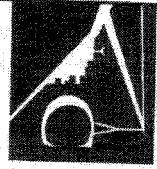
Phone: 410-633-1601  
Fax: 410-633-3475

Date	Day	Vessel	Voy	Cranes	Supervisor	Location	Equipment
7/21/2022	Thursday	MV Indigo Spica			Michalatos / Remney	Canion Pier 11	Ships Gear
Team Hours	Hold	Activity & Cargo			Beatty / Rodgers / Gallardo	PH	XL
<b>GANG 1</b>							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood		2			
1300-1400		Lunch Break					
1400-1900	2	Discharging Plywood		2		X	
<b>GANG 2</b>							
0700-0715		Safety Meeting					
0715-1200	5	Discharging Plywood		4			
1200-1300	5	Discharging Plywood		4		X	
1300-1400		Lunch Break					
1400-1900	5	Discharging Plywood		4			

Daily Total: 624 x total plywood bundles discharged

No Stevedore Damage to Vessel





# ANTHONY STEVEDORING

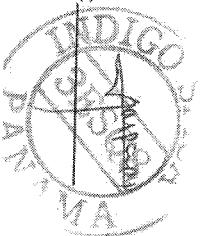
Team Activity Report

Phone: 410-633-1601

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment	PH	XL	SB	Remarks
7/22/2022	Friday	MV Indigo Spica		Michalos / Remey	Canton - Pier 11		Ships Gear				
Team Hours	Hold	Activity & Cargo									
<b>GANG 1</b>											
0700-0715	0700-0715	Safety Meeting									
0715-1300	0715-1230	Discharging Plywood	2				X				Shifted stow, broken bands/straps.
1230-1300	1230-1300	Safety Meeting									All Stop
1300-1400	1300-1400	Lunch Break									
1400-1900	1400-1900	Discharging Plywood	2				X				Shifted stow, broken bands/straps.
<b>GANG 2</b>											
0700-0715	0700-0715	Safety Meeting									
0715-1230	0715-1230	Discharging Plywood	4				X				Brick stow under combing.
1230-1300	1230-1300	Safety Meeting									All Stop
1300-1400	1300-1400	Lunch Break									
1400-1900	1400-1900	Discharging Plywood	4				X				Brick stow under combing.
											Daily total: 55 plywood crates 15x bundles required recouping 2x dumpsters used
											No Stevedore Damage to Vessel

Stevedore Super

三



## Captain/ChiefMate

SuperCargo/Port Captain

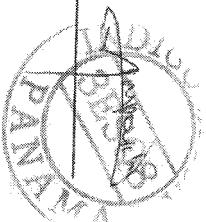

**A C A N T O N  
S T E V E D O R I N G**
**Team Activity Report**

 Phone: 410-633-1601  
 Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment	PH	XL	SB	Remarks
7/23/2022	Saturday	MV Indigo Spica			Michaels/Beattley	Canton - Pier 11	Ships Gear				
<b>Team Hours</b>	<b>Hold</b>	<b>Activity &amp; Cargo</b>									
<b>GANG 1</b>											
0700-0715		Safety Meeting									
0715-1300	2	Discharging Plywood		2				X			Shifted stow, broken bands/straps.
1300-1400		Lunch Break									
1400-1900	2	Discharging Plywood		2				X			Shifted stow, broken bands/straps.
<b>GANG 2</b>											
0700-0715		Safety Meeting									
0715-0845	5	Discharging Plywood		4							
0845-1300	5	Discharging Plywood		4				X			Brick stow under combing.
1300-1400		Lunch Break									
1400-1900	5	Discharging Plywood		4				X			Brick stow under combing.
Daily Total : 388 x plywood bundles * 73 x bundles transferred to warehouse.											
4 x Dumpsters Used.											
1700-1900 Trucks stopped running, continue disch. of vessel and transfer of bundles to warehouse.											
No Stevedore Damage to Vessel											

Stevedore Superintendent:

Captain/ChefMate:



SuperCargo/Port Captain: \_\_\_\_\_



# A.N.T. STEVEDORING

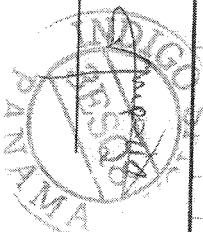
## Team Activity Report

Phone: 410-633-1601  
Fax: 410-633-3475

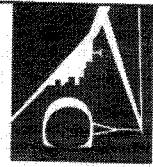
Date	Day	Vessel	Vol	Crane	Supervisor	Location	Equipment	PH	XL	SB	Remarks
7/24/2022	Sunday	MV Indigo Spica			Michalos/Bealey	Canton - Pier 11	Ships Gear				
Team Hours	Hold	Activity & Cargo									
<b>GANG 1</b>											
0700-0715		Safety Meeting									
0715-1300	2	Discharging Plywood				2					
1300-1400		Lunch Break						X			
1400-1900	2	Discharging Plywood				2					
<b>GANG 2</b>											
0700-0715		Safety Meeting									
0715-1015	5	Discharging Plywood				4					
1015-1300	5	Discharging Plywood				4					
1300-1400		Lunch Break									
1400-1530	5	Discharging Plywood				4					
1530-1900	5	Discharging Plywood				4					
No Stevedore Damage to Vessel											
Daily Total: 587 x plywood bundles * 10g x bundles transferred to warehouse. 2 x Dumpsters used 1700-1900 Trucks stopped running, continue disch. of vessel and transfer of bundles to warehouse.											

Stevedore Superintendent: 

Captain/Chief Mate:



SuperCargo/Port Captain:



**A N T O N**  
S T E V E D O R I N G

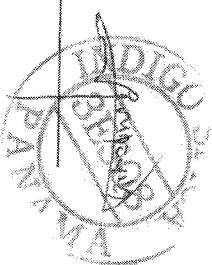
Team Activity Report

Phone: 410-633-1601  
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hold	Activity & Cargo			Michalos/Beatey	Canton - Pier 11	PH   XL   SB   Remarks
7/25/2022	Monday	MV Indigo Spica			Galaraga		
<b>GANG 1</b>							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood	2			X	Brick stow under combing.
<b>1300</b>		<b>ALL GANGS KNOCKED OFF</b>					
<b>GANG 2</b>							
0700-0715		Safety Meeting					
0715-1300	5	Discharging Plywood	4			X	Brick stow under combing.
<b>1300</b>		<b>ALL GANGS KNOCKED OFF</b>					
<b>1600</b>		<b>ILA Garuntee Time 1600</b>					Daily Total: 269 x plywood bundles discharged 16 bundles transferred to warehouse
							No Stevedore Damage to Vessel

Stevedore Superintendent

Captain/Chief Mate



SuperCargo/Port Captain

## EXHIBIT 2

## Canton Port Services LLC

3800 Newgate Avenue, Ste 2

Baltimore, MD 21224

TEL: 410-633-1601

Fax: 410-633-3475

Date	Invoice #
7/12/2022	132468

Vessel / Voyage	MV Indigo Spica
Date of Arrival	7/12/2022

Bill To	
Hanwin Shipping Limited	
Attention:	Justin Cao

Quantity	Rate	Description	Amount
11,550.83	14.00	Stow to Hook USD 14.00 per MT Weight: 11,550.83	161,711.62

REMIT TO Canton Port Services LLC  
 C/O Chase  
 JP Morgan Chase, N.A.  
 Fed. Routing No. 021000021  
 Account No. 766833995  
 Swift Code: CHASUS33

Terms

Total

\$161,711.62

Balance Due

\$161,711.62

## Canton Port Services LLC

3800 Newgate Avenue, Ste 2

Baltimore, MD 21224

TEL: 410-633-1601

Fax: 410-633-3475

Date	Invoice #
7/28/2022	132454

Vessel / Voyage	MV Indigo Spica
Date of Arrival	7/19/2022

Bill To	
Hanwin Shipping Limited	
Attention:	Justin Cao

Quantity	Rate	Description	Amount
116.75	3,200.00	Extra Labor / Distressed Cargo Charges USD 3200.00 per hour 7/19/22 - 10 hrs 7/20/22 - 22 hrs 7/21/22 - 16 hrs 7/22/22 - 20.25 hrs 7/23/22 - 17.5 hrs 7/24/22 - 10 hrs	373,600.00
65	450.00	Overtime Charges USD 450.00 per hour 7/19/22 - 4 hrs 7/20/22 - 6 hrs 7/21/22 - 6 hrs 7/22/22 - 5 hrs 7/23/22 - 22 hrs 7/23/22 - 22 hrs	29,250.00
10	650.00	Dumpster charges USD 650.00 per can 7/20/22 - 2 dumpsters 7/21/22 - 1 dumpster 7/22/22 - 1 dumpster 7/23/22 - 2 dumpsters 7/24/22 - 2 dumpsters 7/25/22 - 2 dumpsters	6,500.00
4,225	-14.00	Credit for Stow to Hook	-59,150.00

REMIT TO Canton Port Services LLC

C/O Chase

JP Morgan Chase, N.A.

Fed. Routing No. 021000021

Account No. 766833995

Swift Code: CHASUS33

Terms

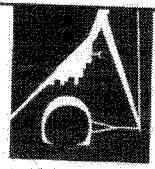
Total

\$350,200.00

Balance Due

\$350,200.00

# EXHIBIT 3

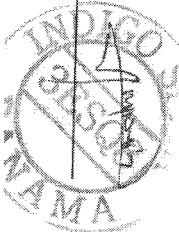

**C A N T O N  
S T E V E D O R I N G**
**Team Activity Report**

 Phone: 410-633-1601  
 Fax: 410-633-3475

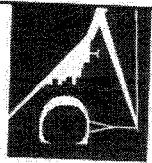
Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hatch	Activity & Cargo			Michalos/Beailey	Pier 11	Ships Gear
<b>GANG 1</b>							
0700-0715		Safety Meeting				X	
0715-1300	2	Discharging Plywood	2			X	Brick stow under combing. Lull machine/Digging Gear.
1300-1400		Lunch Break					
1400-1715	2	Discharging Plywood	2			X	Brick stow under combing. Lull machine/Digging Gear.
1715-1800		ILA Garuntee Time					
<b>GANG 2</b>							
0700-0715	5	Safety Meeting					1545-1645 Platting lower tier in hold 2 and shifting equipment.
0715-1300	5	Discharging Plywood	4				1715 - Stop discharging vessel due to lack of available trucks.
1300-1400		Lunch Break					
1400-1715	5	Discharging Plywood	4				
1715-1800		ILA Garuntee Time					
<b>Gang 3</b>							
1715-1900		Transferring Plywood					1715-1900 Start transferring plywood bundles to warehouse and continue loading available trucks.
							Daily Total: 659 x plywood bundles discharged from vessel. • 153 x plywood bundles transferred to warehouse.
							1 x dumpster filled with damaged straps/debris.
		No Stevedore Damage to Vessel					

Stevedore Superintendent:

Captain/CheifMate:



SuperCargo/Port Captain:



**ANTON**  
STEVEDORING

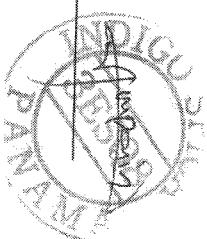
**Team Activity Report**

Phone: 410-633-1601  
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hatch	Activity & Cargo				Pier 11	Ships Gear
8/7/2022	Sunday	MV Indigo Spica			Michaels/Beatey		
0700-0715		Safety Meeting					
0715-0945	2	Discharging Plywood	2				
0945-1300	2	Discharging Plywood	2				
1300-1400		Lunch Break				X	
1400-1900	2	Discharging Plywood	2				
GANG 2						X	Brick stow under combing. Lull machine/Digging Gear.
0700-0715		Safety Meeting					
0715-1115	5	Discharging Plywood	4				
1115-1600		ILA Guarantee Time					
							Daily Total: 543 x plywood bundles discharged * 62 x plywood bundles transferred to warehouse
							3 x dumpster filled with damage/straps/debris.
		No Stevedore Damage to Vessel					

Stevedore Superintendent:

Captain/ChefMate:



SuperCargo/Port Captain:



STEVE DORING

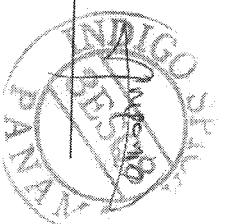
Team Activity Report

Phone: 410-633-1601

	Date	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hatch	Activity & Cargo			Michalos/Remy/ Galamaga	Pier 11 PH	Ships Gear XL SB Remarks
GANG 1							
0700-0715		Safety Meeting					
0745-1230	2	Discharging Plywood		2		X	Brick stow under combing. Lull machine/Digging Gear.
1230-1330		Lunch Break					
1330-1900	2	Discharging Plywood		2		X	Brick stow under combing. Lull machine/Digging Gear.
		Daily Total:360 Plywood Bundles					
		1 x Dumpster filled with damage					
No Sievedore Damage to Vessel							

Stevedore Superintendent

Captain/ChiefMate:



SuperCargo/Port Capital



## AN TO N STEVE DORING

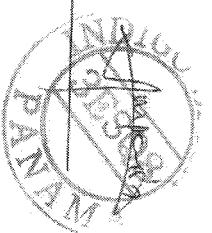
Team Activity Report

Phone: 410-633-1601  
Fax: 410-633-3475

	Date	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hatch	Activity & Cargo			Mitchells/Beatty	Pier 11	PH XL SB Remarks
GANG 1							
0700-0715		Safety Meeting					
0745-1300	2	Discharging Plywood	2			X	Brick stow under comping. Lull machine/Digging Gear.
1300-1400		Lunch Break					
1400-1730	2	Discharging Plywood	2				1215-1300 Removing plate and Lull machine from Hold 2.
GANG 2							1730 - Stop discharging vessel due to lack of available trucks.
1730-1900		Transferring Plywood					1730-1900 Start transferring plywood bundles to warehouse and continue loading available trucks.
							Daily Total: 490 x plywood bundles discharged. 140 x plywood bundles transferred to warehouse.
							1 x Dumpster filled with dunnage
No Stevedore Damage to Vessel							

Stevedore Superintendent

Captain/Chief Mate:



SuperCargo/Port Captain:



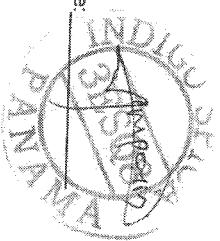
## ANTHONY STEVEDORING

Team Activity Report

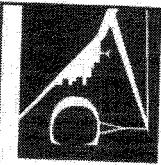
Phone: 410-633-1601  
Fax: 410-633-3475

Slevedore Superintendent.

Captain/Chief Mate:



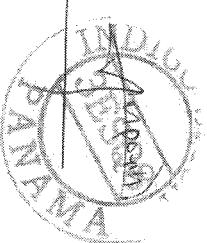
SuperCargo/Port Captain


**A C A N T O N  
S T E V E D O R I N G**
**Team Activity Report**

 Phone: 410-633-1601  
 Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment	PH	XL	SB	Remarks
8/11/2022	Thursday	MV Indigo Spica			Michalos/Beatey	Pier 11	Ships Gear				
Team Hours	Hatch	Activity & Cargo			Remy						
GANG 1											
0700-0715		Safety Meeting									
0715-0945		Standby									
0945-1300	2	Discharging Plywood	2				X				X Inclement Weather
1300-1400		Lunch Break									
1400-1500	2	Discharging Plywood	2				X				
1500-1715	2	Discharging Plywood	2				X				Brick stow under combing. Digging Gear.
1715-1900	2	Discharging Plywood	2				X				Brick stow under combing. Digging Gear.
											Daily Total: 343 x plywood bundles discharged * 66 x plywood bundles transferred to warehouse
											1 x Dumpster filled with damage
		No Stevedore Damage to Vessel!									

Stevedore Superintendent:



Captain/Cheif Mate:

SuperCargo/Port Captain:



# ANTON STEVEDORING

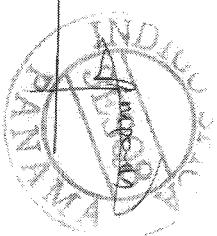
## Team Activity Report

Phone: 410-633-1601  
Fax: 410-633-3475

Date	Day	Vessel	Voy	Crane	Supervisor	Location	Equipment
Team Hours	Hatch	Activity & Cargo				Pier 11	PH XL SB Remarks
8/12/2022	Friday	MV Indigo Spica			Michaels/Bealey		
<b>GANG 1</b>							
0700-0715		Safety Meeting					
0715-1300	2	Discharging Plywood	2			X	Block stow under combing.
1300-1600		LA Garuntee Time					1300 - All cargo discharged, vessel complete.
<b>GANG 2</b>							
1100-1300	2	Hold Cleaning				X	1100-1300 Extra Labor utilized to cleanup excess dunnage/straps/dbhrs within Hold 2.
1300-		Loading Trucks					1300- Continue loading plywood bundles to trucks. All plywood bundles loaded out.
							3 x Dumpster filled with dunnage
		No Stevedore Damage to Vessel					

Stevedore Superintendent:

Captain/Cheif Mate:



SuperCargo/Port Captain:

# EXHIBIT 4

## Canton Port Services LLC

3800 Newgate Avenue, Ste 2

Baltimore, MD 21224

TEL: 410-633-1601

Fax: 410-633-3475

Date	Invoice #
8/15/2022	132524

Bill To	
Vessel / Voyage	MV Indigo Spica
Date of Arrival	8/6/2022
Attention:	Justin Cao

Quantity	Rate	Description	Amount
74.75	3,200.00	Extra Labor Charges USD 3200.00/ gang hour 74.75 gang hours 8/6/22 - 8/12/22	239,200.00
53	450.00	Overtime Charges USD 450.00/ gang hour 53 gang hours 8/6/22 - 8/12/22	23,850.00
14	650.00	Dumpster charges USD 650.00 per dumpster 14 dumpsters 8/6/22 - 8/12/22	9,100.00
2,796	-14.00	Credit for Stow to End of Hook Charges 8/6/22 - 8/12/22	-39,144.00

REMIT TO Canton Port Services LLC

C/O Chase

JP Morgan Chase, N.A.

Fed. Routing No. 021000021

Account No. 766833995

Swift Code: CHASUS33

Terms

Total

\$233,006.00

Balance Due

\$233,006.00